

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC. 20554

In the Matter of

)  
)  
Amendment of Part 15 regarding  
New Requirements and  
Measurement Guidelines for Access  
Broadband over Power Line  
Systems

) ET Docket No. 04-37  
)  
)  
)  
)  
)

To: The Commission

**Reply Comments from Thomas A. Brown**

I find it both interesting and instructive, that, during the short interval that this NPRM proceeding has accepted input, the PLCA, its members and other BPL proponents have traversed the spectrum, with respect to complaints of interference. At the outset, it was alleged that BPL, in its current form, caused absolutely no interference, at all; any commentary to the contrary was labeled as lies or otherwise accorded attempts to discredit the complainants.

Now, at the end of the process, following only a few months of commentary, we find that the PLCA's position and that of other proponents, has undergone a metamorphosis, but a butterfly has not emerged. Instead, the rhetoric is focussed on "explaining away" interference or suggesting mechanisms to ignore or forgive situations where harmful interference occurs - and it does occur.

**Attempts at "notching" have failed** to remove harmful interference, succeeding only in attenuating it by a small, ineffective amount.

"Fostering" the deployment BPL, in its currently available technical configuration has the moral equivalence of promoting the placement of a hog farm lagoon in a residential neighborhood, while touting the positive societal benefit from its operation. It's a grand thing...until it goes into operation...and then, there's just this one little problem.....

BPL, as it exists today, is not ready for deployment at any scale.

Respectfully,

/s/ Thomas A. Brown  
Amateur Radio Licensee N4TAB  
5525 Old Still Rd.  
Wake Forest, NC 27587  
919-556-8477 (w)  
919-528-3104 (h)  
n4tab@earthlink.net